Exhibit A

United States District Court

SOUTHERN DISTRICT OF NEW YORK

TO:

GREETINGS:

WE COMMAND YOU that all and singular business and excuses being laid aside, you appear and attend before the GRAND JURY of the people of the United States for the Southern District of New York, at the United States Courthouse, 500 Pearl Street (North Side), Room 480, in the Borough of Manhattan, City of New York, New York, in the Southern District of New York, at the following date, time and place:

Appearance Date: December 13, 2011   Appearance Time: 10:00 a.m.

to testify and give evidence in regard to an alleged violation of :
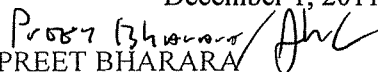
        31 U.S.C. §§ 5314 & 5322

and not to depart the Grand Jury without leave thereof, or of the United States Attorney, and that you bring with you and produce at the above time and place the following:
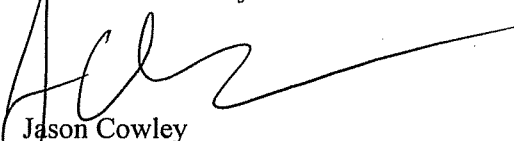
This subpoena is for records described on the attached rider, and not for your testimony. Please produce the records by the above date to: Special Agent Carolyn Working, Internal Revenue Service, Criminal Investigations, 1200 Waters Place, Suite 108, Bronx , New York, NY 10461, United States of America, Tel: (718) 536-3641

Failure to attend and produce any items hereby demanded will constitute contempt of court and will subject you to civil sanctions and criminal penalties, in addition to other penalties of the Law.

DATED:

        December 1, 2011

PREET BHARARA
*United States Attorney for the
Southern District of New York*

Jason Cowley
Assistant United States Attorney
One St. Andrew's Plaza
New York, New York 10007

CLERK

Telephone:

        (212) 637- 2479

RIDER

1. <u>Definitions</u>.

    As used herein, the term "records" means any and all tangible forms of expression, in any language or format, including drafts or finished versions, signed or unsigned versions, originals, copies, or annotated copies, however created, produced or stored (manually, mechanically, electronically, electromagnetically, or otherwise), including without limitation:

    –   All documents reflecting ownership, control, financial interest in, or signature authority, over any account, including but not limited to, Reports of Foreign Bank and Financial Accounts, or FBARs (Form TD F 90-22.1), Forms 5471, Forms W-9, and Forms W-8BEN;

    –   all records used in or resulting from the preparation of federal or state income tax returns, or other filings with any federal, state or foreign tax authority,

    –   Copies of federal and state income and payroll tax returns, state sales tax returns and amended tax returns, whether draft or final, and whether signed or unsigned;

    –   Accountant's work-papers, notes, papers, memoranda, correspondence books, bank statements, canceled checks, deposit tickets, financial statements, correspondence and other documents furnished to, or received from, any accountant relating to state or federal tax returns or other filings with any domestic or foreign tax authority;

    –   Any and all records relating to bank accounts, savings accounts, checking accounts, investment accounts, insurance polices, or other financial institution accounts including but not limited to passbooks, statements, records reflecting dates and amounts of deposits, checks, withdrawals, transfers, interest, debit and credit memos, deposit slips, confirmations of transactions, records reflecting the identity of checks deposited, records reflecting the identity of checks or transfers drawn on the account, withdrawal slips, and records disclosing the disposition of withdrawals, Forms 1099, debit and credit memos, documents reflecting any certificates of deposit, money market certificates, U.S. Treasury Notes or Bills purchased;

    –   Other forms of records, including but not limited to: Books, records, documents, books of account, papers, files, writings, handwritten notes, index cards, business cards, typewritten notes, letters, correspondence, envelopes, shipping labels, transcripts, affidavits or other court papers, memoranda, notebooks, ledgers, databases, spreadsheets, contracts, agreements, term sheets, telexes, faxes, message slips, tape recordings, magnetic tapes, digital recordings, electronic recordings, photographs, video recordings, audio recordings, computerized or electronic records stored in any medium including but not limited to hard drives, networks, servers, compact disks, flash drives, or thumb drives; recorded

telephone messages, recorded fax transmissions, electronic mail messages, voice mail messages, instant messages, text messages, news articles, blog posts, documents reflecting internet searches, microform, microfiche, marketing materials, offering documents, prospectuses, trusts, trust agreements, wills, or other estate planning documents.

2.   Request. Please produce any and all records created, obtained, and or maintained from November 1, 2006 to the present that are in your care, custody, or control relating to any and all bank, securities, or other types of financial accounts in any foreign country in which you have a present or future financial interest, legal interest, beneficial ownership interest, or over which you have signature or other authority, if the aggregate value of these accounts exceeded $10,000 at any time during any calendar year, including but not limited to records required to be maintained pursuant to 31 C.F.R. § 1010.420, namely, records reflecting the name in which each such account is maintained, the number or other designation of such account, the name and address of the foreign bank or other person with whom such account is maintained, the type of such account, and the maximum value of each such account during each calendar year.

3.   Further Instructions.

   A.   Please produce the records in the order in which they are kept and please Bates-stamp the records where possible. At a minimum, please preserve a record of the location at which each item was recovered.

   B.   In addition to hard copies, to the extent electronic records are available, records are requested in the form of magnetic media. Data may be provided on compact disks (CDs). ASCII fixed length files are preferred, however, ASCII delimited format is acceptable. A record layout for the data is also requested.